

Control Number: 48785



Item Number: 56

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CONSOLIDATED SOAH DOCKET NO. 473-19-1265 CONSOLIDATED PUC DOCKET NO. 48785

APPLICATION OF ONCOR ELECTRIC
DELIVERY COMPANY LLC, AEP
TEXAS INC., AND LCRA
TRANSMISSION SERVICES
CORPORATION TO AMEND THEIR
CERTIFICATES OF CONVENIENCE
AND NECESSITY FOR 345-KV
TRANSMISSION LINES IN PECOS,
REEVES, AND WARD COUNTIES,
TEXAS (SAND LAKE TO SOLSTICE
AND BAKERSFIELD TO SOLSTICE)

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

BDEC 21 AM ID: S

RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC AND AEP TEXAS INC. TO OXY'S CORRECTED FIRST REQUEST FOR INFORMATION

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Oncor Electric Delivery Company LLC ("Oncor") and AEP Texas Inc. ("AEP Texas") (together, "Applicants") file this Response to the aforementioned requests for information.

I. Written Responses

Attached hereto and incorporated herein by reference are Applicants' written responses to the aforementioned requests for information. Each such response is set forth on or attached to a separate page upon which the request has been restated. Such responses are also made without waiver of Applicants' right to contest the admissibility of any such matters upon hearing. Applicants hereby stipulate that its responses may be treated by all parties exactly as if they were filed under oath.

II. Inspections

In those instances where materials are to be made available for inspection by request or in lieu of a written response, the attached response will so state. For those materials that a response indicates may be inspected at the Austin voluminous room, please call at least 24 hours in advance for an appointment in order to assure that there is sufficient space and someone is available to accommodate your inspection. To make an appointment at the Austin voluminous room, located at 1005 Congress, Suite B-50, Austin, Texas, or to review those materials that a response indicates may be inspected at their usual repository, please call Teri Smart at 214-486-4832. Inspections will be scheduled so as to accommodate all such requests with as little inconvenience to the requesting party and to company operations as possible.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 16 TAC § 22.74, I certify that on December 21, 2018, a true and correct copy of the foregoing document was served on all parties of record in this matter either in person; by agent; by courier receipt delivery; by first class mail; by certified mail, return receipt requested; by facsimile; or, if authorized, by email.

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Request

Please provide a complete electronic copy of the Geographical Information System ("GIS") Shapefiles/Geodatabase used by Halff Associates, Inc. to perform the Environmental Assessment and Alternative Route Analysis presented as Attachment 1 of the Application.

Response

The following response was prepared by or under the direct supervision of Russell J. Marusak, the sponsoring witness for this response.

By agreement with the requesting party, the following information is being provided in lieu of the information originally sought by excluding Critical Energy Infrastructure Information (CEII) on detailed transmission line locations as well as cultural resource information that is protected by law from disclosure.

The information requested is being provided to the propounding party in electronic format on a DVD. Oncor will provide a copy of the information to other interested parties upon request. See Attachment 1.

ATTACHMENT:

ATTACHMENT 1 – DVD, Folder name: OXY RFI 1-1.zip

Request

Please provide a complete electronic copy, preferably in Microsoft Excel format, of the cost model utilized to create the estimated costs shown in Application Attachment 3. Please leave all formulae and links intact. In addition, please provide a detailed explanation of the methodology utilized to arrive at the costs shown in Application Attachment 3.

Response

The following response was prepared by or under the direct supervision of Wilson P. Peppard and Thomas W. Reynolds, the sponsoring witnesses for this response.

By agreement with the requesting party, the following information is being provided in lieu of the information originally sought by excluding proprietary information on: (i) labor pricing, (ii) steel pricing, and (iii) structure pricing.

The information requested is being provided to the propounding party in electronic format on a DVD. Oncor will provide a copy of the information to other interested parties upon request. See Attachments 1 and 2.

Please refer to Attachment 1 for the requested cost estimate model which excludes the information the requesting party has agreed to remove from the scope of the request.

The cost estimates included as CCN Application Attachment 3 derive from two concepts: applying unitized costs (including proprietary items such as steel, structure and labor pricing, and engineering) to the estimated number of units (such as the estimated number of each structure type on a given link), and developing costs for links that are added together to determine route costs. Route-level costs (such as ROW Acquisition) are then added to a route after summing together the applicable link costs for that route. Oncor has used this same cost estimating methodology in several of its recent CCN proceedings.

Oncor and AEP Texas consulted on this methodology and determined that it fairly represented both companies' estimated costs for their anticipated portions of the project. AEP Texas also separately developed and provided the estimate for Solstice Switch costs associated with this project, which is included as Attachment 2. The estimate shown for additions at AEP Texas' Solstice Switch is for upgrades to interconnect the transmission line from Sand Lake in this case, and does not include substation costs associated with the AEP Texas/LCRA TSC line from Bakersfield Station to Solstice Switch that are separately addressed in the Docket No. 48787 application (now consolidated with this proceeding).

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ATTACHMENTS:

ATTACHMENT 1 – DVD, File name: 6799-SandLake-SolsticeEstimateCCN.xlsx

ATTACHMENT 2 – DVD, File name: Far West II Solstice Switch Station Termination Estimate.pdf

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Request

Please provide a cost estimate for all 408 alternative route options in a similar format as Application Attachment 3.

Response

The following response was prepared by or under the direct supervision of Wilson P. Peppard, the sponsoring witness for this response.

Please refer to Attachment 1 to Oxy RFI Set No. 1, Question No. 1-02.

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Request

Please provide, in electronic format, the type (e.g., tangent, angle, dead-end, etc. for steel monopole, h-frame, lattice, etc. type construction) of structures used on each route and the quantity of each structure type used on the proposed routes. Also, for each structure type provided, please provide a cost estimate of a single structure.

Response

The following response was prepared by or under the direct supervision of Wilson P. Peppard, the sponsoring witness for this response.

By agreement with the requesting party, the following information is being provided in lieu of the information originally sought by excluding the information sought in the final sentence of the request.

The information requested is being provided to the propounding party in electronic format on a DVD. Oncor will provide a copy of the information to other interested parties upon request. See Attachment 1.

ATTACHMENT:

ATTACHMENT 1 – DVD, File name: Structure Counts.xlsx

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Request

Please provide in electronic format, preferably Microsoft Excel, Table 7-1 the Link Composition of Alternative Routes, which is contained in Appendix D of Application Attachment 1.

Response

The following response was prepared by or under the direct supervision of Russell J. Marusak, the sponsoring witness for this response.

The information requested is being provided to the propounding party in electronic format on a DVD. Oncor will provide a copy of the information to other interested parties upon request. See Attachment 1.

ATTACHMENT:

ATTACHMENT 1 –DVD, File name: SL--S Table 7_1.dbf.xlsx

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Request

Please provide in electronic format, preferably Microsoft Excel, Table 7-2 the Environmental Data for Alternative Route Evaluation, which is contained in Appendix E of Application Attachment 1.

Response

The following response was prepared by or under the direct supervision of Russell J. Marusak, the sponsoring witness for this response.

The information requested is being provided to the propounding party in electronic format on a DVD. Oncor will provide a copy of the information to other interested parties upon request. See Attachment 1.

ATTACHMENT:

Attachment 1 – DVD, File name: Table 7-2 Appendix E.xlsx

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Request

Please provide in electronic format, preferably Microsoft Excel, a table similar to Table 7-2 the Environmental Data for Alternative Route Evaluation, which is contained in Appendix E of Application Attachment 1, but which contains the data for each individual link.

Response

The following response was prepared by or under the direct supervision of Russell J. Marusak, the sponsoring witness for this response.

The requested information does not exist in document form. However, the documents provided in response to Oxy RFI Set No. 1, Question No. 1-01, contains data from which such information could be created.

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Request

Please provide the Environmental and Land Use Constraints Maps that are contained in Appendix G of Application Attachment 1 in electronic format, preferably as a .pdf file.

Response

The following response was prepared by or under the direct supervision of Russell J. Marusak, the sponsoring witness for this response.

The information requested is being provided to the propounding party in electronic format on a DVD. Oncor will provide a copy of the information to other interested parties upon request. See Attachment 1.

ATTACHMENTS:

ATTACHMENT 1 - DVD, File name: Appendix G - Figure 3-1A.pdf

ATTACHMENT 2 - DVD, File name: Appendix G - Figure 3-1B.pdf